

**To:** Lederer, Dave[Lederer.Dave@epa.gov]  
**Cc:** Dickerson, Dave[dickerson.dave@epa.gov]  
**From:** Ford, Robert  
**Sent:** Fri 8/4/2017 7:45:55 PM  
**Subject:** RE: AVX Submittal of 6-30-2017 Phase 3 for Aerovox Site  
Phase III RAP-RTN 4-601 EPA-ORD DRAFT Comments.docx

Hi Dave,

Attached is a draft version of my review comments. The attached document also includes review notes that I do not intend to include in a final, draft version.

The biggest issue I find to be problematic at this point is the degree of reliance on the accuracy of modeled groundwater flow. Specifically, the current model indicates that half of the water exchange between the overburden-bedrock aquifer underlying the site and the Acushnet River takes place through bedrock. For me, this does not conceptually align with their presentation of the mapped fracture network.

I know that the reliability of the groundwater model has been criticized previously. To what degree has the model been subjected to review and validation? While it may be late in the game for this step, it appears that the results of groundwater flow modeling exert dominant control on the remedy evaluation. For example, full containment of the overburden aquifer is projected to be unsuccessful, since 50% of all site groundwater is modeled as passing through bedrock. Generally, I find this difficult to believe, although I am willing to be proven wrong.

Can we schedule a time next week on Monday, Tuesday or Wednesday to discuss?

Robert Ford

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**From:** Lederer, Dave  
**Sent:** Saturday, July 08, 2017 8:10 AM  
**To:** Ford, Robert <Ford.Robert@epa.gov>  
**Cc:** Dickerson, Dave <dickerson.dave@epa.gov>  
**Subject:** FW: AVX Submittal of 6-30-2017 Phase 3 for Aerovox Site

Hi Robert—I spoke to the MassDEP. Our initial deadline is August 11. If you could get us your thoughts maybe by 8/4 that would give us time to integrate them with everyone elses. If this is too tight a schedule or if you have other constraints or problems, please let us know. Thanks!

Dave

**From:** Lederer, Dave  
**Sent:** Friday, July 07, 2017 12:04 PM  
**To:** 'Gallagher, Angela (DEP)' <Angela.Gallagher@MAssMail.State.MA.US>; 'Martin, Gerard (DEP)' <Gerard.Martin@MassMail.State.MA.US>  
**Cc:** Dickerson, Dave <dickerson.dave@epa.gov>; Wolf, Steven NAE <Steven.Wolf@usace.army.mil>  
**Subject:** AVX Submittal of 6-30-2017 Phase 3 for Aerovox Site

Hi Angela:

Just to memorialize our conversation, EPA is of course very interested in commenting on the above subject document.

Per our conversation we will aim to comment to MassDEP by August 11, 2017. Vacation schedules might require a little more time but

We will aim for 8/11.

Thanks

David Lederer

Team Leader,

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